Health and Safety Plan
(COVID-19)

Version
1.0
June 23, 2020
This page intentionally left blank
Modifications and/or revisions to the Florida Atlantic University – Health and Safety Plan (COVID-19):

<table>
<thead>
<tr>
<th>Change #</th>
<th>Date</th>
<th>Section/Page(s)</th>
<th>Description</th>
<th>Authorized by</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
# Table of Contents

**Record of Changes** ..................................................................................................................................................... v

**Table of Contents** ...................................................................................................................................................... vi

**Health & Safety Plan (COVID-19)** ................................................................. 1

I. Introduction ............................................................................................................................................................... 1

II. Definitions ................................................................................................................................................................. 1

III. Standard Protective Measures .............................................................................................................................. 3
    Good Hand Hygiene .................................................................................................................................................. 3
    Face Coverings and Physical Distancing ............................................................................................................... 3
    Stay Home If Sick................................................................................................................................................... 4

IV. Vulnerable Populations ......................................................................................................................................... 4

V. Screening and Attestation ..................................................................................................................................... 4

VI. COVID Testing and Contact Tracking ............................................................................................................... 4
    Case Management Procedure............................................................................................................................... 4

VII. EH&S COVID-19 Prevention Training ............................................................................................................... 5

VIII. Physical Distancing and Groups ....................................................................................................................... 5
    Phases 1 and 2 ...................................................................................................................................................... 6
    Phase 1 .................................................................................................................................................................. 6
    Phase 2 .................................................................................................................................................................. 6
    Phase 3 .................................................................................................................................................................. 6
    Classrooms, Labs, and Group Learning Activities ................................................................................................. 6
    Elevators and Restrooms ...................................................................................................................................... 6

IX. Cleaning and Disinfection Practices .................................................................................................................. 7
    General Criteria ..................................................................................................................................................... 7
    Cleaning and Disinfection of General Office Spaces ............................................................................................. 7
    Disinfection of Laboratory Spaces ........................................................................................................................ 8
    Disinfection of Gyms, Computer Labs, Libraries, and Other High Traffic Areas ................................................... 9
    Classrooms ............................................................................................................................................................ 9
    Campus Custodial Disinfection ............................................................................................................................. 9

X. Use of Face Coverings ........................................................................................................................................... 11
    Phases 1 and 2 .................................................................................................................................................... 11
    Phase 3 ................................................................................................................................................................ 12

XI. Physical Distancing Controls and Barriers .................................................................................................... 12
Reconfiguring Spaces ............................................................................................................................................... 12
Sneeze Guards..................................................................................................................................................... 12
Barrier Ropes.................................................................................................................................................... 13
Demarcation Tape............................................................................................................................................... 13
Administrative Controls .................................................................................................................................. 13
XII. Enforcement ................................................................................................................................................ 14
XIII. Signage .................................................................................................................................................... 15
XIV. Plan Review and Updates ......................................................................................................................... 15
I. Introduction

The purpose of this document is to offer specific guidance regarding mitigation measures employed at FAU to limit the spread of COVID-19 in our FAU community. These measures have been identified by health experts as integral to reducing the communication of the virus that causes COVID-19, thus permitting the operations of our community to continue utilizing a multi-phased approach.

The Phases indicated herein are specific to FAU and may not deploy in the same timeframes as those on a Federal, State, or Local level. It is important that FAU progress through the phases appropriate to our operations and conditions. Phases, along with the specific FAU requirements, will be communicated and can be found on the Owl Ready App and the FAU Coronavirus Website at https://www.fau.edu/coronavirus.

The measures contained herein are not exhaustive but provide a basic roadmap that can be instituted at all corners of our campus community. Responsibility is shared by faculty, staff, and students to help avoid illness and maintain operations. Specific operations associated with employees and students at FAU will be operationalized at each Unit, Division, and Department based on the principle elements of each phase of reopening.

This plan is subject to change and will be updated and communicated based on the latest available information from health authorities and FAU administration.

II. Definitions

Close Contact: Being within approximately 6 feet of a COVID-19 case for a prolonged period of time (15 minutes or more).

Physical distancing – Defined as remaining a minimum of 6-feet away from others to avoid getting sick or spreading germs to others.

Face covering – A piece of cloth (preferably cotton) that fits snugly but comfortably against the side of the face, covers the nose and mouth, includes multiple layers of fabric, allows breathing without
restriction, and can be laundered and machine dried without damage or change in shape. For the purposes of this document, face covering may include dust masks and personal protective equipment manufactured to cover the nose and mouth and filter the air.

**FAU Reopening Plan Phases** – Segments of time in the overall reopening plan designed to ramp up operations commensurate with a reduction in external triggers, appropriate mitigation efforts by the FAU community, and alignment with Federal, State, and Local guidance from health authorities. The current phase of FAU will be clearly communicated and also posted on the FAU Coronavirus website [here](#).

**Isolation** - Separates sick people with a contagious disease from people who are not sick for a period of time until they are medically cleared to return to the general population. Isolation is necessary for confirmed and presumptive cases of COVID-19.

**Public Activities**: For the purposes of this document, the term public activities include any activities on campus that take place around others or could potentially bring someone in contact with others.

**Quarantine**: Separates and restricts the movement of people who were exposed to a contagious disease to see if they become sick. Quarantine is necessary for those with close contact to COVID+ cases and other instances as advised by the CDC.

**Vulnerable Population**: For the purposes of this document, the CDC defines the Vulnerable Population as those who must take additional precautions due to a higher risk of severe illness from COVID-19 including:

- Persons aged 65 and over
- People of all ages with underlying medical conditions, particularly if not well controlled, including:
  - People with chronic lung disease or moderate to severe asthma
  - People who have serious heart conditions
  - People who are immunocompromised
  - Many conditions can cause a person to be immunocompromised, including cancer treatment, smoking, bone marrow or organ transplantation, immune deficiencies, poorly
controlled HIV or AIDS, and prolonged use of corticosteroids and other immune weakening medications
  o People with severe obesity (body mass index [BMI] of 40 or higher)
  o People with diabetes
  o People with chronic kidney disease undergoing dialysis
  o People with liver disease

III. **Standard Protective Measures**

All members of the FAU Community have equal responsibility to protect themselves and those around them from the spread of COVID-19 while on FAU campuses.

Each member of the FAU Community will be responsible for supplying their own face coverings and personal hand sanitizers.

**Good Hand Hygiene**

- Wash/sanitize hands frequently.
- When available, use soap and water and scrub hands for a minimum of 20 seconds.
- If soap and water is not available, use an alcohol-based hand sanitizer (at least 60% alcohol content) and cover all hand surfaces and rub until dry.
- Regardless of the cleaning practices conducted, all persons should wash or sanitize their hands after each touch of shared equipment, common surfaces, etc., before using the restroom, eating, applying cosmetics or lip balm, and before touching their face.
- Cough/sneeze into a tissue. Dispose of used tissues immediately into a trashcan and then wash hands.

  *Note: If there are no tissues available, cough/sneeze into the crook of your elbow, not your hands*

- Avoid touching your face, eyes, nose, and mouth. This can accelerate the spread of infection.

**Face Coverings and Physical Distancing**

- Wear face coverings while in public.
- Maintain physical distancing from others, as indicated by the phase of the FAU Reopening Plan.
Stay Home If Sick

- Do not go to work or school if you are sick
- Contact and follow the advice of a medical provider

IV. Vulnerable Populations

In accordance with CDC Guidance, members of the vulnerable population should continue to shelter in place until Phase 3. Members of households with vulnerable residents should be aware that by returning to work or other environments where distancing is not practical, they could carry the virus back home. Protecting members of our FAU community who are more vulnerable to COVID-19 is of paramount importance. HR has developed guidance to assist supervisors with discussing alternative work arrangements with those that may need them. Those who are older or those with underlying health conditions that need an alternative working arrangement associated with COVID-19 should speak with their supervisor or contact HR.

V. Screening and Attestation

Return-to-campus screening and attestation of health will be conducted with all employees and students prior to their return to campus.

A health screening tool will be configured inside the Owl Ready Application for use by employees and students to help those monitoring their health to obtain instructions on next steps.

VI. COVID Testing and Contact Tracking

FAU will conduct voluntary and targeted testing for COVID-19 for both employees and students. The program will be designed around prompt response to positive cases through testing and contact tracking to reduce the potential for spread and hotspots on our campuses. This program will include the availability of on-request testing for students and employees that want to be tested by appointment.

FAU policy will support the isolation and quarantine of COVID+ cases and close contacts, respectively and in accordance with the current guidelines from the CDC.

Case Management Procedure

- All positive cases of COVID-19 must be reported to Student Health Services as soon as possible. Positive cases will be required to isolate at their place of residence and must be medically cleared by SHS prior to return to on campus activities.
- SHS will manage cases and contacts and further coordinate with other departments as needed HR and EH&S.
- Close contacts of COVID+ cases will be tested and required to quarantine at their place of residence for 14 days prior to returning to campus. Reference table below for details.

<table>
<thead>
<tr>
<th>Case Management Areas</th>
<th>Students and Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>FAU Contact for COVID+ Cases</td>
<td>SHS – 561-297-3512</td>
</tr>
<tr>
<td>Medical Case Management</td>
<td>SHS and Primary Care Physician, if any</td>
</tr>
<tr>
<td>Isolation/Quarantine Orders</td>
<td>SHS based on CDC Guidance</td>
</tr>
<tr>
<td>Campus Isolation Requirements</td>
<td>Positive cases must remain isolated in their place of residence until cleared by SHS to resume normal activities on campus.</td>
</tr>
<tr>
<td>Campus Quarantine Requirements</td>
<td>Close contacts of a COVID+ case must submit to testing and quarantine in their place of residence for 14 days under monitoring by SHS.</td>
</tr>
</tbody>
</table>

VII. **EH&S COVID-19 Prevention Training**

Trainings will be delivered in CANVAS to all students and employees returning to campus outlining the requirements of this plan for interaction on the FAU campus.

VIII. **Physical Distancing and Groups**

The need for physical distancing will be different at each phase of recovery, but to the degree possible and practical, it remains the best defense against COVID-19.
Phases 1 and 2

- Hold all meetings/gatherings, including one-on-one meetings online or over the phone wherever possible.
- Avoid close contact with others, maintaining greater than 6 feet of separation wherever possible.
- Keep a face covering on your person when traversing the campus and wear the face covering when in public and when around others.
- Wear a face covering when entering a restroom, an elevator, and on FAU Transportation.
- Some locations (labs, service areas, and vivarium’s, etc.) could have unique requirements, wear protection based on the location you are entering and adhere to posted signs.

Phase 1

Always maintain strict physical distancing of 6 feet between people. A limit of 10 people in a group. Events where physical distancing is not possible are not permitted.

Phase 2

Maintain moderate physical distancing of 6 feet between people wherever possible. A limit of 50 people in a group. Events where physical distancing is not possible are not permitted.

Phase 3

Maintain limited physical distancing, permitting additional personal space between people wherever possible. Although there are no limits to the number of people in a group or venue, avoid overcrowding.

Classrooms, Labs, and Group Learning Activities

Physical distancing will be required at all-times, but the dynamics of grouping people together and moving people around for learning activities will necessitate the use of face coverings at all-times in classrooms, labs and group learning activities.

Elevators and Restrooms
Face coverings must be worn inside. Those entering should take caution not to overcrowd and maintain as much physical distancing as possible from others.

IX. **Cleaning and Disinfection Practices**

Cleaning and disinfection practices are one of our most important prevention measures, however cleaning practices are **not a replacement for good hand hygiene**.

*Note: Campus Custodial will continue throughout the phases to maintain general housekeeping in all areas. This section is focused on COVID-related sanitation and cleaning to reduce the presence of virus on surfaces.*

**General Criteria**

- When feasible, use an EPA-registered disinfectant that is effective against COVID-19. The list of EPA-registered disinfectants can be found [here](#).

  *Note: While these products are ideal, there may be occasions when EPA-registered products are unavailable due to country or world-wide shortages. In these instances, alternative cleaning agents will be distributed for use.*

- Most disinfectants will not be effective on a soiled surface, if necessary, clean gross debris and dust from the surface first.

- For cleaning surfaces, use wipes moistened with a disinfectant or a spray and paper towels. Do not use wipes in lieu of hand sanitizer.

Below are some general groups of different spaces that require sanitation. Also reference the table at the end of this section.

**Cleaning and Disinfection of General Office Spaces**

Disinfection of high contact surfaces within general office spaces will be conducted by each department/unit, consistent with these guidelines and the reopening plans submitted by individual departments/units. Utilizing disinfection wipes, gloves and a face covering, units will wipe down commonly touched surfaces several times per day. Units will acquire their own supplies to conduct these wipe-downs. Wipe down of commonly touched areas may include countertops, doorknobs, sneeze guards, shared equipment, appliances, and the like.
Use caution when using harsh chemicals too often on surfaces like electronics, appliances, and compressed wood surfaces as the products can significantly alter the integrity of these substrates.

**Disinfection of Laboratory Spaces**

The disinfection of laboratories will be conducted by the laboratory. Develop a list of high-touch locations and equipment in the laboratory. Special attention should be given to those areas that will have continued use:

- Benchtops
- Equipment handles and latches
- Equipment controls and touchpads
- Drawer and cabinet handles
- Door handles
- Bin and water incubator lids
- Hand tools, Micro-pipettors
- Faucet handles and sprayer grips
- Chemical bottles and lids
- Chair backs and arm rests
- Pens, whiteboard markers

These types of areas represent a higher probability of viral loading in the work area and should be disinfected on a routine basis following the proper procedure described below:

Clean soiled areas with detergent and water

Spray areas with disinfectant and allow to work for the amount of time recommended, then wipe clean. Alternatively, you can utilize disinfection wipes for the area.
Clean and disinfect identified locations on a routine basis. At a minimum, it is recommended that this be when an individual enters the laboratory to begin work and then before leaving the laboratory when work is completed.

**Disinfection of Gyms, Computer Labs, Libraries, and Other High Traffic Areas**

The disinfection of high contact surfaces and equipment in these spaces will be conducted by individual area users under supervision of area staff. High traffic areas with high touch points must be cleaned more frequently than any other area of the campus.

These areas must require users to wipe down equipment, tables and other individual-use surfaces before each use. Staff within these areas will be required to monitor disinfection practices and disinfect any surfaces that may be missed by individual cleaning processes.

**Classrooms**

Classrooms will require wipe down of high contact surfaces in between classes at a minimum and will be conducted by each class. Students should wipe down their desks upon entry into the room.

**Campus Custodial Disinfection**

Disinfection of common areas, hallways, large venues, and high touch surfaces outside offices, classrooms, entrances, elevators, stair railings, restrooms, break rooms, and the like will be professionally cleaned by the approved FAU vendor using an approved protocol at least once per day.

Upon confirmation of a positive case of COVID-19 in the FAU community, an approved vendor will conduct a deep-cleaning of the affected areas using an approved protocol.

<table>
<thead>
<tr>
<th>Area</th>
<th>Common Surfaces for Disinfection (Not Exhaustive)</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Office Space</td>
<td>Individual workspaces.</td>
<td>Employees or area user</td>
</tr>
<tr>
<td>In-suite Common Areas</td>
<td>High Touch Surfaces such as copiers, coffee areas, appliances,</td>
<td>Unit managers</td>
</tr>
<tr>
<td>Area</td>
<td>Common Surfaces for Disinfection (Not Exhaustive)</td>
<td>Responsible Party</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Common Building Break Rooms</td>
<td>tables, scheduling board pens/erasers, door handles and knobs, etc.</td>
<td>Campus Custodial</td>
</tr>
<tr>
<td></td>
<td>Campus Custodial</td>
<td>FAU community will request additional cleaning through FAMIS if deficiencies are noted.</td>
</tr>
<tr>
<td>Classrooms</td>
<td>Tables, desks, podiums, pens/erasers for white boards, remote controls, high touch room electronics</td>
<td>Students/Professors wipe down individual work areas before/after each use.</td>
</tr>
<tr>
<td>Conference Rooms (Should minimize use)</td>
<td>Tables, desks, podiums, pens/erasers for white boards, remote controls, high touch room electronics</td>
<td>Meeting host and participants wipe down individual work areas before/after each use.</td>
</tr>
<tr>
<td>Gyms, Computer Labs, Libraries</td>
<td>Equipment, computer equipment, tables, desks and other high touch points</td>
<td>Area users wipe down individual spaces before/after each use; monitored by area staff for additional cleaning needed following use.</td>
</tr>
</tbody>
</table>


<table>
<thead>
<tr>
<th>Area</th>
<th>Common Surfaces for Disinfection (Not Exhaustive)</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>Common Areas Across Campus</td>
<td>Hallways, Common Break Rooms, Building Entrance Doors, Elevator buttons/doors, stairwell railings, Common Area Tables/Chairs, restrooms, and other high touch points in common areas like tables, doorknobs, light switches, countertops, handles, phones, keyboards, toilets, faucets, sinks, ATM machines, etc.</td>
<td>Campus Custodial</td>
</tr>
<tr>
<td></td>
<td>FAU community will request additional cleaning through FAMIS if deficiencies are noted.</td>
<td></td>
</tr>
</tbody>
</table>

X. Use of Face Coverings

The necessity for face coverings will be driven by several factors that will change slightly at each Phase of FAU Recovery.

Care and use of face coverings and the materials required to make a DIY face covering are the responsibility of each individual in the FAU Community. Face coverings must be cleaned routinely and made of a cloth material that can be normally laundered and dried. Ideally, have multiple face coverings made and rotate usage. Refer to the [CDC Guidance on Cloth Face Coverings](https://www.cdc.gov/coronavirus/2019-ncov/face-masks/index.html) for more information.

Phases 1 and 2

Face coverings should be worn during all public activities and when around others. Face coverings are required when in close proximity to others and wherever physical distancing cannot be maintained. All employees and students are required to have a face covering available, and on their person, while traversing the campus.
Situations that call for mandatory face coverings include, but are not be limited to, riding in FAU buses or shuttles, riding in vehicles, golf carts, or utility vehicles with others, riding elevators, and using restroom facilities.

**Phase 3**

The use of face coverings is voluntary on campus during Phase 3.

**XI. Physical Distancing Controls and Barriers**

Administrative and engineering controls can reduce the potential transmission of COVID droplets between people. The following are examples, but not exhaustive of the options available.

*Note: The measures contained in this section do not replace the need for face covers, hand hygiene, sanitation practices and physical distancing wherever possible.*

**Reconfiguring Spaces**

There may be a need to move furnishings, change traffic flow, block off areas, or remove furnishings in order to increase the physical distancing of people and processes. Moving heavy objects should be done carefully and with the assistance of others. Scenarios may include:

- Either remove desks and chairs or block off every other table to increase the space between students and prevent close proximity.
- Moving furniture around to afford more space between people either seated or standing.
- Reducing the instruction space in a classroom to increase the space in the student seating area.

**Sneeze Guards**

Wherever there is sustained interaction between people, the use of a sneeze guard should be considered for feasibility. Locations that could benefit from the use of a sneeze guard include:

- Counters where paper, supplies, or other materials are exchanged.
- Counters for placing an order or making a request.
- Reception or check-in areas with counters.
Note: An alternative to the use of sneeze guards, could be to require the of disposable face shields for area occupants. The headpiece can be sanitized between uses and the face shield portion is disposable. Contact EH&S if this is an alternative you want to explore.

Those departments with a need for sneeze guards should place a request in FAMIS for evaluation of their area.

**Barrier Ropes**

Barrier ropes or some similar material can be placed around areas that need to be inaccessible. These barriers are hinderances to close contact with others and may be necessary where other measures are insufficient to maintain physical distances.

**Demarcation Tape**

Barrier tape is placed on the floor to demarcate the area where someone should not pass further. Unlike barrier ropes, tape does not provide a physical barrier, but may have useful applications where the tape can be placed on a floor substrate and not impede cleaning activities. Demarcation tape should be accompanied by signage, notifying patrons to stop at that point, for maximum effectiveness.

**Administrative Controls**

Where physical controls are not practical, administrative controls will be needed to avoid crowding or excessive close proximity. Examples may include:

- Avoid in-person meetings where possible or schedule meetings outside or in larger venues allowing for physical distancing.
- Hold one-on-one meetings outside.
- Closing office doors and placing signs to text or call the occupant for an impromptu meeting.
- Locking suite doors and providing contact information for occupants outside the door.
- Exchanges of packages, mail, and other materials should take place in common areas, rather than inside individual spaces.
- Asking students to leave a completed class in an orderly and physical distancing fashion where those closest to the door leave first and all persons remaining 6 feet apart upon exit. When filling the class, have those sitting the furthest back enter first.
• Distance queuing can be used to move people into a large venue, moving only a few people at a time and maintaining physical distancing during entry.

XII. Enforcement

Enforcement of the health and safety plan for FAU recovery will require all departments and individuals to do their part. The following are sample recommendations for enforcement responsibilities.

<table>
<thead>
<tr>
<th>Compliance Areas</th>
<th>Enforcement Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Workspace sanitation</td>
<td>Department Heads and Supervisors will notify employees to wipe down commonly touched surfaces every two hours.</td>
</tr>
<tr>
<td>Common area sanitation</td>
<td>Students, Faculty, and Staff can place a work order for service of an area.</td>
</tr>
<tr>
<td>Employee sick at work</td>
<td>Department Heads and HR will require sick employee to return home if sick.</td>
</tr>
<tr>
<td>Student sick in class</td>
<td>Professors and SHS will require students to return home or to their residence hall if sick.</td>
</tr>
<tr>
<td>Maintaining physical distancing</td>
<td>Students, Faculty, and Staff will remain 6 feet from others at all times or all persons in close proximity must wear face coverings. Each member of the FAU community will need to assist in enforcement.</td>
</tr>
<tr>
<td>Failure to wear face coverings</td>
<td>Supervisors are responsible for enforcing the use of face coverings among employees.</td>
</tr>
</tbody>
</table>
Compliance Areas | Enforcement Action
--- | ---
Faculty and FAU Employees operating areas of the campus will be responsible for enforcing the use of face coverings among students. | Not wearing face coverings to ride on FAU transportation | Bus Drivers will deny entry to any FAU transportation if the rider does not have a face covering in place.

Staff, Faculty, and Students can report a hazard or noncompliance directly the EH&S at the following link: [http://www.fau.edu/ehs/safety/hazard-report-form/](http://www.fau.edu/ehs/safety/hazard-report-form/).

Health and safety requirements will be enforced through the existing FAU regulations outlined in both the student and employee codes of conduct.

XIII. **Signage**

FAU signage has been developed for use throughout our campuses; only approved signage for COVID-19 safety practices may be used. If new signage is needed, contact FAU Public Affairs for development and approvals.

XIV. **Plan Review and Updates**

Due to the frequent evolving nature of FAU recovery, this plan will require frequent revision and communication to the FAU Community. The Department of Environmental Health and Safety is authorized to amend this incident specific health and safety plan to maintain operational consistency, implement corrective action, and enhance the document or apply other appropriate changes. At a minimum, this plan will be revised, and changes communicated at the following points:

- Change to authoritative guidance on recovery response actions
- Transition between phases
- Need for new hazard control measures